

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This Document Relates to:

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

Authenticom, Inc. v. CDK Global, LLC et al.,
Case No. 1:18-cv-00868 (N.D. Ill.)

**DECLARATION OF MICHAEL N. NEMELKA IN SUPPORT OF
AUTHENTICOM'S OPPOSITION TO DEFENDANTS' MOTION TO COMPEL
PCM LOG AND CORPORATE TESTIMONY UNDER RULE 30(B)(6)**

I, Michael N. Nemelka, pursuant to 8 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C., which is Counsel for Authenticom, Inc. in the above captioned case. I respectfully submit this declaration in support of Authenticom Inc.'s Opposition to Defendants' Motion to Compel PCM Log and Corporate Testimony Under Rule 30(b)(6).

2. Attached as Exhibit 1 is a true and correct copy of the Declaration of Brian Clements, dated June 8, 2019.

3. Attached as Exhibit 2 is a true and correct copy of a letter from Leo Caseria to Michael N. Nemelka and Peggy J. Wedgworth, dated May 23, 2018.

4. Attached as Exhibit 3 is a true and correct copy of a letter from Michael N. Nemelka to Britt Miller, Brian Ross, and Leo Caseria, dated May 25, 2018.

5. Attached as Exhibit 4 is a true and correct copy of a letter from Leo Caseria to Michael N. Nemelka and Peggy Wedgworth, dated June 5, 2018.

6. Attached as Exhibit 5 is a true and correct copy of a letter from Michael N. Nemelka to Leo Caseria, dated July 27, 2018.

7. Attached as Exhibit 6 is a true and correct copy of a letter from Michael N. Nemelka to Leo Caseria, dated August 2, 2018.

8. Attached as Exhibit 7 is a true and correct copy of Authenticom's Objections and Responses to Defendant CDK Global, LLC's First Requests for the Production of Documents, dated November 13, 2017.

9. Attached as Exhibit 8 is a true and correct copy of a letter from Michael N. Nemelka to Ross MacDonald, dated November 16, 2018.

10. Attached as Exhibit 9 is a true and correct copy of an email from Micah Stein to Michael N. Nemelka, dated April 18, 2019.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 8, 2019

/s/ Michael N. Nemelka
Michael N. Nemelka